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Attorneys for Defendant
Mr. Vasquez

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-CR-175-DAD
Plaintiff,)
vs.) **STIPULATION AND ORDER FOR
TEMPORARY RELEASE FROM CUSTODY TO
ATTEND A FAMILY MEMBER'S BURIAL
SERVICE**
VINCENT JOSE VASQUEZ,)
Defendant.) Date:
) Time: [Enter Time Here]
) Judge: Carolyn K. Delaney

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through David Spencer, Assistant United States Attorney, counsel for Plaintiff, and Heather E. Williams, Federal Defender, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Vincent Jose Vasquez, that compelling reasons exist pursuant to 18 U.S.C. § 3142(i) for Mr. Vasquez to be ordered temporarily released from custody at the Yuba County Jail on Tuesday, November 8, 2022 at 8:00 a.m. to attend the burial service of his great aunt, Kathy Trujillo. Mr. Vasquez is a pre-trial detainee, and the government has no opposition to this temporary release under the terms and conditions in this stipulation.

Ms. Trujillo helped raise Mr. Vasquez and they were close. He lived with her in Galt, California for three years while attending middle school because Mr. Vasquez's mother was unstable. Ms. Trujillo's burial service will be held on Tuesday, November 8, 2022 at 11:00 a.m.

1 at the Galt Cemetery located at 14180 Joy Dr., Galt, California 95632. *See Exhibit A,*
2 *Announcement of Passing and Services.*

3 The parties also stipulate to the following conditions of release. Mr. Vasquez shall be
4 released to the custody of Federal Defender Investigator Melvin Buford for the sole purpose of
5 attending Ms. Trujillo's burial service and shall remain in Investigator Buford's custody
6 throughout his time on temporary release. Investigator Buford shall return Mr. Vasquez back to
7 custody at Yuba County Jail as soon as the burial service is over, but no later than Tuesday,
8 November 8, 2022 at 5:00 p.m. Upon release, Mr. Vasquez shall review and sign the Notice to
9 Defendant Being Released and file it on the docket. While on release, Mr. Vasquez shall abide
10 by any conditions the Court will impose.

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Respectfully submitted,

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DATED: November 7, 2022

HEATHER E. WILLIAMS
Federal Defender

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/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Vincent Jose Vasquez

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DATED: November 7, 2022

PHILLIP A. TALBERT
United States Attorney

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/s/ David Spencer
DAVID SPENCER
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

GOOD CAUSE APPEARING based on the stipulation of the parties.

IT IS HEREBY ORDERED, that Defendant Vincent Jose Vasquez be temporarily released from United States Marshal and Yuba County Jail custody on Tuesday, November 8, 2022 at 8:00 a.m. to the custody of defense investigator Melvin Buford for the sole purpose of Mr. Vasquez attending his great aunt, Kathy Trujillo's burial service. Mr. Vasquez shall remain in Investigator Buford's custody throughout his time on temporary release. Investigator Buford shall return Mr. Vasquez back to custody at Yuba County Jail as soon as the burial service is over, but no later than Tuesday, November 8, 2022 at 5:00 p.m. Investigator Buford is ordered to notify the government and Pretrial Services immediately if Mr. Vasquez is non-compliant with the conditions of release. Mr. Vasquez will be subject to the terms and conditions set forth in the Notice to Defendant Being Released, attached hereto as Exhibit B.

Mr. Vasquez shall sign this Notice and it will be filed on the court docket. IT IS SO
FOUND AND ORDERED.

Dated: November 7, 2022

Carol H. Delaney

CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE